

*AMJ
2-23-2017*

LW/DEH/USAO#2015R00652

FEB 23 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND BY

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

[Signature]
DEPUTY

<p>UNITED STATES OF AMERICA</p> <p>v.</p> <p>ANTONIO SHROPSHIRE, a/k/a "Brill", a/k/a "B", a/k/a "Tony",</p> <p>OMARI THOMAS, a/k/a "Lil' Brill", a/k/a "Lil B", a/k/a "Chewy",</p> <p>ANTOINE WASHINGTON, a/k/a "Twan",</p> <p>ALEXANDER CAMPBELL a/k/a "Munch",</p> <p>GLEN KYLE WELLS a/k/a "Lou", a/k/a "Kyle",</p> <p>and</p> <p>MOMODU BONDEVA KENTON GONDO, a/k/a "GMoney", a/k/a "Mike",</p> <p>Defendants.</p>	<p>Criminal Number: JKB 16-051</p> <p>(Conspiracy to Distribute and Possess with Intent to Distribute Heroin, 21 U.S.C. § 846; Distribution of Heroin Resulting in Death, 21 U.S.C. § 841(b)(1)(C); Possession with Intent to Distribute and Distribution of Heroin and Cocaine, 21 U.S.C. § 841(a); Aiding and Abetting, 18 U.S.C. § 2, Criminal Forfeiture, 21 U.S.C. § 853)</p>
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THIRD SUPERSEDING INDICTMENT

The Grand Jury for the District of Maryland charges that:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

From no later than the beginning of 2010, and continuing through on or about the date of this Third Superseding Indictment, in the District of Maryland and elsewhere,

**ANTONIO SHROPSHIRE,
a/k/a/ “Brill”, a/k/a “B”, a/k/a “Tony”,**

**OMARI THOMAS,
a/k/a “Lil Brill”, a/k/a/ “Lil B”, a/k/a/ “Chewy”,**

**ANTOINE WASHINGTON
a/k/a “Twan”,**

**ALEXANDER CAMPBELL
a/k/a “Munch”,**

**GLEN KYLE WELLS
a/k/a “Lou”, a/k/a “Kyle”, and**

**MOMODU BONDEVA KENTON GONDO,
a/k/a “GMoney”, a/k/a “Mike”**

the defendants herein, did knowingly and willfully combine, conspire, confederate and agree with persons known and unknown to the Grand Jury, to knowingly, intentionally and unlawfully distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

MANNER AND MEANS OF THE CONSPIRACY

1. Among the manner and means by which the defendants and others conducted and participated in the conduct of the conspiracy were the following:
 - a. Members of the conspiracy, known to law enforcement as the Shropshire Drug Trafficking Organization, distributed narcotics in Northern Baltimore and elsewhere. Members of the conspiracy primarily distributed heroin around or near the Alameda Shopping Center in Baltimore, Maryland.
 - b. Members of the conspiracy distributed heroin to customers, which resulted in multiple overdoses, including overdose deaths.
 - c. Members of the conspiracy utilized residences within Baltimore, Maryland to process, cut, repackage and prepare heroin for distribution to customers.
 - d. Members of the conspiracy routinely carried firearms in furtherance of the conspiracy.
 - e. Members of the conspiracy conducted counter-surveillance of law enforcement in an attempt to prevent law enforcement from detecting the illegal activities carried out by the Shropshire Drug Trafficking Organization.
 - f. Members of the conspiracy removed, caused to be removed, or assisted others in removing law enforcement GPS tracking devices from vehicles so that members of law enforcement could not track the movements of members of the Shropshire Drug Trafficking Organization, which could disclose locations of sources of supply, stash locations where narcotics were stored, locations of firearms, and other criminal activities involving members of the conspiracy.

g. Members of the conspiracy frequently changed cell phones used to arrange narcotics sales so that law enforcement would be unable to intercept illicit communications involving members of the conspiracy.

2. It was further part of the conspiracy that Baltimore Police Department Detective Momodu GONDO provided sensitive law enforcement information to other members of the Shropshire Drug Trafficking Organization in order to prevent law enforcement from disrupting or dismantling the organization's narcotics trafficking operations, and further to protect GONDO's co-conspirators.

OVERT ACTS

The Defendants and members of the Shropshire Drug Trafficking Organization, including indicted members and unindicted members, committed acts in furtherance of the organization's objectives, which include, but are not limited to, the following:

Shropshire, Campbell and Gondo Sold or Intended to Sell Narcotics

3. From 2010 until the dates of their arrests, SHROPSHIRE, WASHINGTON, CAMPBELL, WELLS, and GONDO collectively distributed, or intended to distribute, multiple kilograms of heroin to customers throughout the Baltimore area. For example, members of the Shropshire Drug Trafficking Organization trafficked heroin on the following dates:

- a. On or about July 15, 2015, in Baltimore, Maryland, SHROPSHIRE did possess with intent to distribute and distribute heroin. Specifically, SHROPSHIRE distributed approximately 10 grams of heroin to an undercover officer.
- b. On or about May 10, 2016, in Baltimore, Maryland, CAMPBELL did possess with intent to distribute and distribute heroin. Specifically, CAMPBELL distributed

approximately 2 grams of heroin during a controlled purchase.

- c. On or about May 24, 2016, in Baltimore, Maryland, CAMPBELL did possess with intent to distribute heroin. Specifically, CAMPBELL possessed with intent to distribute approximately 16 grams of heroin.
- d. On or about August 20, 2016, in Baltimore, Maryland, GONDO did possess with intent to distribute heroin. Specifically, GONDO possessed with intent to distribute approximately 27 gel capsules of heroin.
- e. On or about November 30, 2016, in Baltimore, Maryland, SHROPSHIRE did possess with intent to distribute heroin. Specifically, SHROPSHIRE possessed with intent to distribute approximately 17 grams of heroin.

Washington Distributes Heroin Resulting in Death of J.L.

4. The Shropshire Drug Trafficking Organization's distribution of heroin caused overdoses, including fatal overdoses. For example, on or about December 27, 2011, WASHINGTON did possess with intent to distribute and distribute heroin, and J.L. died as a result of the use of said substance that was distributed by WASHINGTON.

Washington is Arrested and Uses the Recorded Jail Phone System to Discuss Narcotics Trafficking Involving Wells, Shropshire, and Campbell

5. WASHINGTON was charged and arrested for distribution of heroin resulting in the death of J.L., but continued to talk with his co-conspirators about trafficking heroin. On December 30, 2015, WASHINGTON called CAMPBELL over the recorded telephone system at the Chesapeake Detention Facility. During the conversation, WASHINGTON asked CAMPBELL, "What's up tho, What's the word?" CAMPBELL replied, "Shit, Shit looking

good.” WASHINGTON asked, “That shit back in compliance? What you got the missile [high quality heroin] right now?” CAMPBELL replied, “Umm Hmm.” CAMPBELL then said, “Lou [WELLS] gave me 65 the other day.” WASHINGTON asked about the 65 grams of heroin received from WELLS, “He back hitting niggas like that?” CAMPBELL replied, “Hell yea, bringing that shit right back.” Washington said, “Paparazzi, that shit real quick.” Washington continued, “I am going to do this shit when I get back yo. Just got to slack up on the drugs yo, and don’t catch a real bad habit. You get more money, the higher you get.” Later in the conversation WASHINGTON said, “I’m getting the team back, me, Brill [SHROPSHIRE], Lou [WELLS], and you, doing everything boss shit like I’m supposed to be doing, it’s going to be hard for niggers to get to me.”

6. WELLS cautioned WASHINGTON not to say anything incriminating about their narcotics trafficking on the phones, but WASHINGTON and CAMPBELL nonetheless discussed specific details about the quantities of heroin received from WELLS to distribute to customers. During a recorded jail call on January 1, 2016, CAMPBELL stated that he was about to meet Lou [WELLS]. CAMPBELL stated, “Making sure we on deck, [WELLS] gives me whatever I want.” WASHINGTON asked, “Definitely on deck?” CAMPBELL replied, “Definitely on deck.” CAMPBELL added, “He [WELLS] don’t hit me with no less than 40 yo, no less than 45 for real,” referring to grams – an amount of heroin worth \$3,600 to \$5,400 on the street. During the call CAMPBELL put WELLS on the phone. WELLS warned WASHINGTON, “Don’t say no dumb shit on the phones.” WASHINGTON agreed. Later in the conversation, CAMPBELL got back on the phone and began to tell WASHINGTON that he (CAMPBELL) was setting profits to the side for WASHINGON for when he gets out of jail. WASHINGTON replied, “Tell Lou

[WELLS] hold that for me and I am going to dictate my money how I want it to go." CAMPBELL replied, "You good on my end. You know I got it yo." WASHINGTON said, "Yeah, yeah, yeah. I am good."

7. WASHINGTON and CAMPBELL discussed the sale of heroin to customers. During a recorded jail call on January 2, 2016, CAMPBELL asked, "You haven't been seeing Ben have you?" WASHINGTON inquired, "What Ben?" CAMPBELL replied, "Ben two." WASHINGTON said, "No". CAMPBELL then explained to WASHINGTON that "Ben" was trying to argue the price for two grams of heroin, so CAMPBELL instructed "Ben" to go buy it somewhere else. CAMPBELL advised, "He ended up finally paying that Yo." WASHINGTON instructed, "You got to watch them." CAMPBELL sold heroin to WASHINGTON's customers using WASHINGTON's "money phone", a phone number which CAMPBELL had ported over to a new phone once law enforcement seized WASHINGTON's phone at his arrest.

8. WASHINGTON and CAMPBELL discussed changing their cell phones to avoid law enforcement detection of the Shropshire Drug Trafficking Organization's unlawful activity. In a recorded jail call on January 2, 2016, WASHINGTON directed CAMPBELL, "Switch the hammer jacks [cell phones] up too yo. Just get one and do like that. Like I was telling you to do it. It will be better for our safety while everything is going on right now." CAMPBELL asked, "You said do what?" WASHINGTON repeated, "Switch the hammer jacks up." CAMPBELL asked, "Just buy a new one?" WASHINGTON answered, "Yeah."

9. WASHINGTON and CAMPBELL discussed owing WELLS money for heroin and keeping the "operation" going after WASHINGTON was released from prison. In a recorded jail

call on January 7, 2016, CAMPBELL asked WASHINGTON, “You didn’t have any paper when they booked you?” WASHINGTON answered, “Hell no, I just met Lou [WELLS] that... I had probably like \$300.” CAMPBELL asked, “You met Lou [WELLS] that night.” WASHINGTON replied, “I met Lou [WELLS] the night before.” WASHINGTON stated, “He didn’t do nothing for me right then and there because I had to do something else for him [Lou didn’t give Washington any heroin because Washington still owed Lou more money].” CAMPBELL told WASHINGTON, “You need to keep the operation going like this when you get home and all that.” WASHINGTON asked, “Huh?” and CAMPBELL repeated his previous statement about the organization. CAMPBELL told WASHINGTON, “Lou will give me anything I ask for” and WASHINGTON interrupted and said “Hell yeah, no names, never over the phone dammit.” When CAMPBELL and WASHINGTON began to talk about money again, WASHINGTON said, “Put it all up ‘til I get out there yo. I am going to show you what to do with it.” CAMPBELL replied, “I know what to do with it.” WASHINGTON added, “I really need you right now.” CAMPBELL replied, “I got you.”

Thomas Explains that he is “Lil’ Brill” and Works for Shropshire

10. In order to shield himself from law enforcement, SHROPSHIRE utilized various street dealers to distribute his heroin. One of those street dealers was THOMAS, known to SHROPSHIRE (“Brill”) and his customers as “Lil’ Brill.” After THOMAS met with SHROPSHIRE at SHROPSHIRE’s residence on March 10, 2016, a female called THOMAS. During the conversation THOMAS asked who was calling and the female stated, “It’s Gretchen... is this Brill?” THOMAS replied, “Oh it’s Gretchen... come on down yo.” Gretchen stated,

"Alright is this Brill [SHROPSHIRE]?" to which THOMAS replied, "Nah this little Brill." Gretchen and THOMAS then made arrangements to meet at a location.

11. SHROPSHIRE instructed THOMAS about the quality and price of heroin that THOMAS should sell for SHROPSHIRE. For example, on March 23, 2016, at 5:39 p.m. THOMAS received an incoming call from J.K. During the call THOMAS asked J.K. if he (J.K.) liked the stuff he (THOMAS) has been giving him. J.K. replied "it ain't bad" to which THOMAS stated, "Cause B, [SHROPSHIRE a/k/a "B"] don't want me selling it." J.K. questioned, "he don't want you selling it?" and THOMAS replied, "No he don't want it no more, he want me wait till we get something else. But if you want I can make you something." THOMAS then told J.K. that he was getting "something new" but not for an hour or more. J.K. told THOMAS he would take what he had for a good price. THOMAS told J.K. he had a lot of that heroin left, THOMAS stated, "More like, well like thirty (30), well like thirty, thirty grams left." J.K. replied "God dang. So you're running specials is what I'm hearing?" THOMAS replied, "Nah I had two hundred (200) you know I'm a get it gone anyway." J.K. then asked THOMAS for a break on the price for the heroin SHROPSHIRE doesn't want THOMAS selling. THOMAS told J.K. he would call SHROPSHIRE to see what he said about the price.

Shropshire Directs Unknown Male to Receive Heroin from "Mal"

12. SHROPSHIRE also arranged for the sale of heroin with customers, but had street dealers distribute the heroin to the customers so SHROPSHIRE could avoid law enforcement surveillance. On March 24, 2016, SHROPSHIRE spoke to an unknown male. SHROPSHIRE stated "The nigga the nigga about to come down there now." The unknown male replied, "I about said you didn't forget about me what.... What nigga I looking for? Does he drive something? What

you? Say it again.” SHROPSHIRE then told the unknown male “The nigga Mal with the dreads...” SHROPSHIRE and the unknown male then talked about the appearance of “Mal” and how he had dread style hair, which was most likely “cornrowed up”, SHROPSHIRE also stated that he (Mal) knew him (Unknown male). The unknown male then asked “He got the whole four?” SHROPSHIRE stated “He have the whole four.” The unknown male then asked what kind of car “Mal” would be driving, which SHROPSHIRE advised he might be driving a rental vehicle.

Detective Gondo Helps Shropshire Get Rid of DEA GPS Tracking Device on his Vehicle

13. Detective GONDO provided protection, information and tips to his co-conspirators about how to avoid being arrested. For example, on March 31, 2016, at approximately 5:03 p.m., SHROPSHIRE, called Baltimore Police Department Detective GONDO and SHROPSHIRE greeted GONDO as “Poppy” and GONDO asked “What’s up Brotha?” SHROPSHIRE responded, “Well, I got a question for you.” GONDO said, “I’m listening” and SHROPSHIRE continued, “I took the car to the shop” and “And, uh, the thing was, the thing was lit,” referring to a GPS tracking device that SHROPSHIRE had discovered attached to his vehicle when he took the vehicle to a repair shop. Investigators of the U.S. Drug Enforcement Administration had previously installed the device without SHROPSHIRE’s knowledge. SHROPSHIRE then asked, “What to do with it?” GONDO asked how late the “shop” was open and then said, “I’m trying to see, run that by me one more time.” SHROPSHIRE responded, “You know, you know what I’m talking about?” and GONDO said, “Yeah!” and “Yo just um, is this an iPhone?” SHROPSHIRE replied that he was using an iPhone, and then GONDO said, “Just FaceTime me, yo,” referring to iPhone’s videoconferencing feature, FaceTime, which enabled them to talk

without risk of being intercepted by law enforcement, something GONDO knew as a law enforcement officer.

14. After communicating with SHROPSHIRE over FaceTime, on March 31, 2016, at approximately 5:21 pm, Detective GONDO placed an outgoing call to SHROPSHIRE in which he directed SHROPSHIRE to “get rid of” the GPS tracking device. During the call, Detective GONDO said, “Yeah basically when that, something like that happens yo, is basically, you know what I mean on, on the other side [law enforcement], you know it’s just a loss [to law enforcement]. You feel me?” SHROPSHIRE said, “Right” and then GONDO continued, “But definitely, definitely somebody’s been tracking you. So...” SHROPSHIRE said, “I’m gonna pop it on somebody else car [unintelligible].” GONDO, concerned about being intercepted over the phone, replied, “You know I don’t even know who I’m talking to so whatever you do you do, but...” SHROPSHIRE responded, “Right” and GONDO continued, “Just be mindful, just be mindful of that brother. So whatever you do.” SHROPSHIRE again replied, “Right” and GONDO said, “But yeah you definitely gotta get rid of it. Alright?”

15. Following GONDO’s instruction, SHROPSHIRE removed the DEA’s GPS tracking device from his vehicle and placed it on another vehicle. On April 12, 2016, SHROPSHIRE called WELLS and said “I don’t know what the fuck is going on” and WELLS asked, “is that good or bad?” and SHROPSHIRE told WELLS that things were “all bad” and arranged to meet face to face.

Thomas Explains that he and Shropshire Work Together to Sell Drugs

16. After SHROPSHIRE removed the tracking device, SHROPSHIRE continued his heroin trafficking and distribution through his street dealer, THOMAS. On April 15, 2016 at

1920 hours, THOMAS received an incoming call and as THOMAS answered the call he (THOMAS) asked “who this?” The male calling stated “This George, yo.” THOMAS then asked “This who?” George then stated “Nah, this ain’t Brill [SHROPSHIRE] is it?” THOMAS then replied “Yea this his phone, but I got it.” GEORGE then attempted to arrange to purchase heroin from THOMAS.

17. THOMAS told SHROPSHIRE’s customers that THOMAS worked with SHROPSHIRE. On April 16, 2016, THOMAS received an incoming call from an unknown male. During the call THOMAS answered with “Yo.” The unknown male replied, “Hey what’s up boss?” THOMAS then told the unknown male, “I ain’t call you up, I think, I don’t, I don’t know if I can, I, I think I, fucking lost, left my other phone in the car yo.” The unknown male then asked THOMAS if he (THOMAS) had another number he can text him on, THOMAS replied, “I got this phone too though, so.” The unknown male told THOMAS, “I didn’t fucking know that. I thought it was Brill’s [SHROPSHIRE’s] phone.” THOMAS replied, “you ‘know me and Brill [SHROPSHIRE] do shit together.” The unknown male and THOMAS then discussed meeting for a heroin sale. THOMAS told the unknown male he had “fire” [a street term for a high-quality heroin product”] and the unknown male advised THOMAS that he would contact THOMAS once he was close to the area of Loch Raven Boulevard in Baltimore. THOMAS then met the unknown male.

Detective Gondo Discusses His Cash Proceeds from Drug Sales and Admits: “I Sell Drugs”

18. Detective GONDO earned money selling drugs. On April 30, 2016, at approximately 4:27 a.m., GONDO placed a telephone call to N.F. and GONDO explained, “I don’t make 1,200 in one day, you feel me, without me doin’, you feel me, some other, I mean I can, I do

it.” GONDO referred to “stack[ing] money” and explained how he earned money: “I come from money, I have money” and “I [unintelligible] money, you know what I mean? I recoup it, I get it back quick, ten-fold, you feel me.”

19. Detective GONDO arranged special access for and meetings with WELLS and SHROPSHIRE at a nightclub. On May 4, 2016, at approximately 9:53 p.m., Detective GONDO called N.F and asked to reserve a table at a nightclub for “Kyle” [WELLS] and “Brill” [SHROPSHIRE]. GONDO further advised that he would come to the club with them.

20. During a call on May 7, 2016, at approximately 4:18 a.m., N.F. asked GONDO: “Where did you go today?” GONDO told her, “I sell drugs. That’s what I did today.” N.F. said, “No you didn’t. Where’d you go tonight?” GONDO, responded, “I’m tellin’ you what I did. Bookie. I don’t wanna lie to you. Why would I lie to you for?” N.F. asked, “Why would you sell drugs?” GONDO answered, “You already know what it is.” N.F. said, “Ah. No” and GONDO continued, “But this (unintelligible) we talked in the morning.” N.F. again asked, “Why are you selling drugs.” After a pause, GONDO said, “Yes, Bookie. I see you at the crib.” The call ended, but GONDO called N.F. again and mentioned that he went out to the nightclub and had several thousand dollars on him. N.F. misheard GONDO, and asked why he had two thousand dollars on him, and GONDO replied, “oh I got more than two thousand on me.”

21. Detective GONDO had \$10,000 cash on his person on May 7, 2016, when he returned home from a nightclub. At approximately 5:35 a.m., GONDO placed an outgoing call to an associate who had given him a ride home. During the call GONDO said, “I just got [in] to the crib [home], yo” and the associate replied, “I dropped you off, yo.” GONDO complained that the associate didn’t make sure GONDO got inside his house safely, because Gondo said, “I had

fuckin' 10,000 [\$10,000 in cash] on me, yo."

Detective Gondo Provided Sensitive Law Enforcement Information to Wells to Protect Wells and Other Members of the Shropshire Drug Trafficking Organization

22. Detective GONDO, using his status as a sworn member of the Baltimore Police Department's Gun Trace Task Force ("GTTF"), obtained information about law enforcement operations near WELLS and passed law enforcement intelligence to WELLS to protect him. On June 27, 2016, at approximately 6:43 p.m., Detective GONDO placed a telephone call to Officer 1, another Baltimore Police Department officer. GONDO said he was trying to "see where you all was at". Officer 1 replied, "Um, we over um, northeast [the northeast section of Baltimore] right now you. Um, I'm a send you a pin [location information] yo." GONDO was unsure what Officer 1 meant and Officer 1 explained, "A pin yo, like my location to my phone, my iPhone." An iPhone has a feature which allows the user to text the precise location (pin) on a map which shows the user's location. GONDO advised he understood and the call ended.

23. A few minutes later, on June 27, 2016, at approximately 6:55 p.m., GONDO placed a telephone call and WELLS answered, "Yo" and GONDO replied, "Woo, you got my text, yo?" referring to a text message he had sent WELLS identifying the location of Officer 1 who was conducting law enforcement operations. WELLS responded, "No" and GONDO said, "Alright, just look at your text yo, everything straight. Ahright." WELLS replied, "Alright." Based on the location coordinates of the officers, GONDO did not believe that WELLS should be concerned about getting arrested by law enforcement.

24. GONDO confirmed that WELLS had received his text message identifying the location of law enforcement, and GONDO and WELLS discussed law enforcement tactics of

Officer 2, who GONDO knew was targeting WELLS. On June 28, 2016, at approximately 11:06 a.m., GONDO placed a telephone call to WELLS and GONDO asked, “You got the text though yesterday right [the text message GONDO sent WELLS the day before described in the previous paragraph]?” and WELLS responded, “Yeah, hell yeah, hell yeah.” GONDO continued to discuss and explain specific tactics used by Officer 2 who was targeting WELLS, but GONDO assured WELLS that GONDO would protect him: “Yo, fool yo, so you know I'm hit your phone [alert WELLS to law enforcement's targeting of WELLS], man, that's like, yo, any, yo that real shit its bad [law enforcement are actively targeting WELLS], yo. Its bad, yo.” WELLS replied, “I already know, yo, like. It's, man.” GONDO told WELLS he would provide him with information about law enforcement: “I tell you man, yes sir! Yes! No question, yo. No question. Bad, yo, but anyway fuck that shit though man what the fuck is up.” WELLS replied, “Yeah, I already know its code red [there is law enforcement presence in WELLS' location]. I already know its code red.” GONDO said, “Yeah, code red. It's bad, yo.” WELLS said, “You know how it is, they [law enforcement] just running around going crazy.” WELLS laughed and GONDO replied, “Going crazy, yo. That's how that nigger [Officer 2] is, yo. Real shit. That shit bad, yo.” After GONDO confirmed that WELLS was ok, the call ended.

25. After GONDO told WELLS about law enforcement's efforts to detect WELLS' illegal activities, WELLS became suspicious of law enforcement attempting to arrange an undercover transaction involving WELLS. On July 5, 2016, at approximately 1:07 p.m., D.G., an associate, placed a recorded jail call to WELLS. During the conversation, WELLS brought up how he had received a text message that he suspected was from law enforcement. Specifically, WELLS said, “Somebody playing on my phone for real. Police, or somebody tryin' to rob a

nigger.” D.G. asked what he said and WELLS said, “Text the phone out of the blue, talkin’ about whatever” and “I said who this [chuckles]? They like J.” D.G. said, “J? Who the fuck” and WELLS said, “I’m lookin’ at the phone like who the fuck is J [WELLS doesn’t recognize the number that sent him the text messages].” WELLS told D.G. that WELLS asked, “Man, look, do you know who you are talkin’ to?” WELLS then said the person who contacted him said, “Yo like, man yeah yo, I’m talkin’ to yo with the dreads [WELLS]. I met you at the gas station, you told me to hit the phone. I’m tryin’ to get straight [buy drugs].”

26. GONDO warned WELLS that GONDO believed the phone contacts came from Officer 2, who GONDO knew to be targeting WELLS. On July 5, 2016, at approximately 5:12 p.m., GONDO placed a telephone call to WELLS. After WELLS answered the phone, GONDO said, “That sound like [Officer 2], yo.” WELLS replied, “That’s the same thing I was saying, yo.” GONDO said, “Yeah, he talk like that, yo. I ain’t with him, yo. Me and whatchucallhim [Officer 3], we workin’ on somethin’ else, yo. Um, you know what I mean?” WELLS acknowledged and GONDO continued discussing Officer 2, “[unintelligible], that some shit he’d do, yo. I don’t know that number, though.” WELLS said, “It’s one of those text back numbers, you can’t call it.” GONDO told WELLS how Officer 2 could call from an unknown number and explained, “Oh, so he probably do like, Google, some shit, or somethin’.” WELLS said, “Every time you call it [the phone number], it [unintelligible].” GONDO continued, “Yeah, what did it was, when he was like, what was that shit. Dud da dah.” WELLS replied, “What did it was when he say bitch. Bitch put me on to you [this phrase was what made WELLS think the texts were unusual]. I already thought it was [Officer 2] at first. Before we even got all way down to that [read the whole text message].” GONDO said, “Right.” WELLS continued, “I already

thought it was [Officer 2].” GONDO said, “This nigger crazy, yo. Yo, I’ll pull him up [GONDO will talk to Officer 2 and deter Officer 2 from going after WELLS], yo.”

27. GONDO contacted Officer 3 to confirm the phone contacts came from the law enforcement officer who was targeting WELLS. On July 5, 2016, at approximately 6:32 p.m., GONDO received a telephone call from Officer 3 and Officer 3 said, “What the fuck is that, yo?” GONDO replied, “That’s [Officer 2] texting Brill, from another phone, actin’ like.” Officer 3 said, “Whaaat?” Officer 3 continued, “Wow! Why he get his [WELLS’] number, yo?” GONDO said, “I mean, that’s what they [the police] do. I mean, he, he, he already, you know what I mean, he the one who text me [WELLS forwarded the text messages to GONDO], that was his first thought. That was his first thought. Then I read how the text messages were stated, and I knew that was him [Officer 2], you know.” Officer 3 asked, “Does he [Officer 2] got an informant that got his [WELLS’] number?” GONDO replied, “I mean, anybody could have gave him the guy’s number. And he said he called the number back and it was like a Google number. You know like a made up number.” GONDO and Officer 3 discussed how the wording of the text messages sounded like Officer 2. Officer 3 said, “Dude ain’t gonna fuckin’ just reach out to somebody he don’t know [WELLS isn’t going to arrange a drug transaction with someone he doesn’t know].” GONDO replied, “Right. And then you see like, the black emojis and all that shit. You know what I mean.” Officer 3 said, “What the fuck, yo.”

28. GONDO told Officer 3 he was going to reach out to Officer 1 in order to try and protect WELLS. Concerned that WELLS and other co-conspirators could be apprehended by law enforcement, GONDO said, “I’m gonna pull [Officer 1] up first. Yeah, I gotta say something to [Officer 1], think, c’mon man, you been at my house, man. You seen that man there [Officer 1]

has seen WELLS at GONDO's house]. Man know your face [WELLS knows Officer 1]. Ain't that crazy." Officer 3 said, "Yeah. You got, yeah, [unintelligible] 'cause Officer 1 be around, yeah." GONDO replied, "Yeah, they [GONDO and Officer 3 talk over each other] me and you not there. And that's what I said. I'm like, yo, we doin' somethin'. And you know, they not gonna go out here and really. They gonna try to get drugs. They goin' try to get drugs that early. You feel me? Probably try to set it up. Ain't nobody else doin' that textin' the phone type shit, you feel me? That's yo m.o.," referring to the way Officer 2 conducted law enforcement operations.

29. WELLS told D.G. that GONDO knew the specific officer that sent the text message to WELLS and was targeting him, and, in response, D.G. told WELLS to get rid of his phone. On July 6, 2016, at approximately 12:38 p.m., D.G. called WELLS and asked, "So, you say, somebody keep tryin' your phone, so you don't just block the number?" WELLS replied, "Yeah, you're right. I'm blocking for now, but I think it's the police and I don't want them to have that number at all." D.G. said, "Yeah" and WELLS continued, "Look, I sent it to the Cuzo [GONDO]. Cuzo say that look like [Officer 2's] work." D.G. said, "Oh, okay. You gotta get rid of that motherfucker. Fuck that. [unintelligible] clear of them people. Stay the fuck away from that nigger, man. D.G. and WELLS then discussed how the officer had tried to contact WELLS the day before, but WELLS' has blocked his number, and how now WELLS needed to get rid of his phone to allude law enforcement and continue drug trafficking.

30. GONDO explained to WELLS that GONDO had told Officer 2 to stop targeting WELLS. On July 9, 2016, at approximately 1:52 a.m., GONDO placed a telephone call to WELLS and said, "Boy, I got in [Officer 2's] butt for you, yo!" WELLS replied, "Did you?" and

GONDO said, "Oh my Gosh! C'mon, man. No question man. It's me, yo. I'm runnin' every light out here, man. Fuck these lights. No question, yo." WELL^S said, "I appreciate it, sir." GONDO said, "You ain't have to appreciate shit, yo. You my brother." WELL^S said, "I really do appreciate." GONDO and WELL^S discussed whether it would be worth it for GONDO to go down to Miami. A little later in the call, WELL^S said, "On another note, you know, the 19th, I'm be gone away from here for a little while sir [WELL^S is going to prison]. But I expect to holler at you in between that. Somewhere, somehow."

Detective Gondo and Wells Discussed Roles in Conspiracy

31. Before WELL^S went to prison, he and GONDO discussed SHROPSHIRE's role in the conspiracy and planned for WELL^S' return to narcotics trafficking after he served his sentence. On July 18, 2016, at approximately 11:56 p.m., GONDO received a call from WELL^S and discussed being out with SHROPSHIRE and his girlfriend and the dynamics of their relationship. WELL^S explained that Shropshire's girlfriend knows that WELL^S is the "enforcer" who has to supervise SHROPSHIRE. GONDO complained that when GONDO is with SHROPSHIRE, GONDO struggles to "enforce" because SHROPSHIRE is "all over the place." WELL^S said that SHROPSHIRE's girlfriend "minds her paper" and "she's in the money business too". WELL^S said that SHROPSHIRE's girlfriend sees what members of the organization are doing and not doing, and when she sees SHROPSHIRE is not "busting down", she knows that SHROPSHIRE is not pulling his weight and does not have "a third, or a half, or a fourth" and she is "not no bitch who just playing a part." GONDO agreed with WELL^S. WELL^S continued, "She a boss bitch [the girlfriend is successful]. She fuckin' [in a relationship] with, supposedly, boss nigger [SHROPSHIRE is supposed to be in charge of their organization and doing well]. You feel me?"

But that's not how it's all panning out to be right now [SHROPSHIRE is not making enough money for the organization]." GONDO then said, "Yeah, I fuck with yo, I definitely fuck with him [referring to SHROPSHIRE]." WELLS said, "It's still my man. [unintelligible] get his shit together. But I'm cuttin' him off." WELLS continued, "I'm gonna go [unintelligible], I'm gonna go to jail like I usually do any other time. And I'm gonna come home and I'm gonna be even further than I was, in front of him [WELLS is going to be a more successful drug dealer than SHROPSHIRE], than I was when I started. That's why I'm not fuckin' with him [WELLS isn't going to do business selling drugs with SHROPSHIRE after he gets out of prison]. There's no reason why I should keep lappin' you [SHROPSHIRE], yo. If I keep lappin' you, then you end up bringing me down one way or another, yo." GONDO agreed that they should cut off SHROPSHIRE, "Right, no question." WELLS said, "Yeah, if I'm givin' you [SHROPSHIRE] time to be up front in the race, when I come home I should be tryin' to catch you. I shouldn't come home and be in front of you. C'mon man, what the fuck is wrong with you? When I come home, you should be givin' me 10, 15 [\$10,000 or \$15,000]." GONDO agreed that SHROPSHIRE should provide money to WELLS and said, "Yeah, yeah, no question." GONDO referenced a time that GONDO previously provided WELLS with money. WELLS said, "I'm like, yo, everybody who I left, I ain't even leave nobody in my position, but one thing for sure, [unintelligible], everybody I left owed me money [all WELLS' drug associates owed WELLS money], yo." WELLS explained how they didn't pay WELLS back when he got out of jail. GONDO said, "you can't really worry about that, Lou."

32. WELLS and GONDO continued discussing how they made money from narcotics trafficking, and WELLS said, "Look, when I be talkin' to other people, right. I be like, man, my

best friend went right [GONDO appeared to get a legitimate job], I went left [WELLS makes money selling drugs], man, but we still here.” GONDO said, “Oh yeah, no question. We through thick and thin man, it’s always gonna be like that.” WELLS said, “but we still here.” And GONDO said, “Still here, it don’t matter. Still here both getting’ money. That’s just it.” WELLS said, “Ima go ahead and knock this little six months out [jail sentence].” GONDO said, “Oh yeah, that’s what you supposed to do.”

21 U.S.C. §§ 841, 846.

18 U.S.C. § 2

Quantity of Controlled Substances Involved in the Conspiracy

With respect to: **ANTONIO SHROPSHIRE, a/k/a/ "Brill", a/k/a "B", a/k/a "Tony"** **ANTOINE WASHINGTON, a/k/a "Twan", and ALEXANDER CAMPBELL, a/k/a "Munch";** the quantity of controlled substances in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is one kilogram or more of a mixture or substance containing heroin, in violation of 21 U.S.C. § 841(b)(1)(A); and

With respect to: **OMARI THOMAS, a/k/a "Lil Brill", a/k/a/ "Lil B", a/k/a/ "Chewy"; MOMODU BONDEVA KENTON GONDO, a/k/a "GMoney", a/k/a "Mike", and GLEN KYLE WELLS a/k/a "Lou", a/k/a "Kyle",** the quantity of controlled substances in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 100 grams or more of a mixture or substance containing heroin, in violation of 21 U.S.C. § 841(b)(1)(B).

COUNT TWO

(Possession with Intent to Distribute and Distribution of Heroin Resulting in Death)

The Grand Jury for the District of Maryland charges that:

On or about December 27, 2011, in the District of Maryland, the defendant

ANTOINE WASHINGTON, a/k/a "Twan"

did knowingly, unlawfully and intentionally possess with intent to distribute and distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841, and death resulted from the use of said substance.

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

COUNT THREE

(Possession with Intent to Distribute and Distribution of Heroin)

The Grand Jury for the District of Maryland charges that:

On or about July 15, 2015, in the District of Maryland, the defendant

ANTONIO SHROPSHIRE, a/k/a “Brill”, a/k/a “B”, a/k/a “Tony”,

did knowingly, unlawfully and intentionally possess with intent to distribute and distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841.

21 U.S.C. § 841(a)(1)

COUNT FOUR

(Possession with Intent to Distribute and Distribution of Heroin)

The Grand Jury for the District of Maryland charges that:

On or about May 10, 2016, in the District of Maryland, the defendant

ALEXANDER CAMPBELL a/k/a "Munch"

did knowingly, unlawfully and intentionally possess with intent to distribute and distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841.

21 U.S.C. § 841(a)(1)

COUNT FIVE

(Possession with Intent to Distribute and Distribution of Heroin)

The Grand Jury for the District of Maryland charges that:

On or about May 24, 2016, in the District of Maryland, the defendant

ALEXANDER CAMPBELL a/k/a "Munch,"

did knowingly, unlawfully and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841.

21 U.S.C. § 841(a)(1)

COUNT SIX

(Possession with Intent to Distribute Heroin)

The Grand Jury for the District of Maryland charges that:

On or about August 20, 2016, in the District of Maryland, the defendant

MOMODU BONDEVA KENTON GONDO,

a/k/a “GMoney”, a/k/a “Mike”

did knowingly, unlawfully and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841.

21 U.S.C. § 841(a)(1)

COUNT SEVEN

(Possession with Intent to Distribute Heroin and Cocaine)

The Grand Jury for the District of Maryland charges that:

On or about November 30, 2016, in the District of Maryland, the defendant

ANTONIO SHROPSHIRE a/k/a "Brill,"

did knowingly, unlawfully and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841.

21 U.S.C. § 841(a)(1)

FORFEITURE

The Grand Jury further finds that:

Pursuant to Title 21 U.S.C. § 853(a), upon conviction of Counts One, Two, Three, Four, Five, Six or Seven in this Third Superseding Indictment, each defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation;

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

21 U.S.C. §853(a), 21 U.S.C. §2461(c), Fed. R. Crim. P. 32.2(a).

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Rod J. Rosenstein / ZJR
Rod J. Rosenstein
United States Attorney
2/23/17
Date